

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

GLJ, LLC d/b/a O2-COOL, )  
                                )  
Plaintiff,                 ) Civil Action No. 08 CV 4412  
                                )  
                                ) Judge Kennelly  
v.                            ) Magistrate Judge Cox  
MANY MINI TOYS,            )  
RHODE ISLAND NOVELTY and   )  
BULLET LINE INC.,           )  
                                )  
Defendants.                )

AGREED MOTION FOR  
ENTRY OF CONSENT JUDGMENT

NOW COME plaintiff, GLJ, LLC d/b/a O2-Cool ("O2-Cool"), and defendant, Many Mini Toys ("MMT" ), by and through their counsel, and respectfully move this Court to enter the Consent Judgment, a copy of which is attached hereto as Exhibit A.

O2-Cool and MMT have agreed to resolve their differences by way of a consent judgment. MMT has agreed to cease all sales of products that O2-Cool contends infringe the claims of U.S. Patent Nos. 5,338,495 and 5,843,344 and has agreed to the entry of a consent judgment acknowledging that U.S. Patent Nos. 5,338,495 and 5,843,344 are valid. In addition, the consent judgment provides for

entry of an injunction against future acts of infringement by MMT of U.S. Patent Nos. 5,338,495 and 5,843,344 (Exhibit A).

WHEREFORE, in view of the foregoing, O2-Cool and MMT request entry of the attached Consent Judgment.

Respectfully submitted,

/s/ Kathleen A. Lyons  
KEITH V. ROCKEY (ID #02360624)  
KATHLEEN A. LYONS (ID #06186939)  
Rockey, Depke & Lyons, LLC  
Sears Tower, Suite 5450  
233 South Wacker Drive  
Chicago, Illinois 60606  
Telephone: (312) 277-2006  
Facsimile: (312) 441-0570

Attorneys for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing AGREED MOTION FOR ENTRY OF CONSENT JUDGMENT were served on counsel for defendants in the manner indicated below, this 24th day of February, 2009:

Via CF/ECM

Joseph N. Hosteny III  
Niro, Scavone, Haller & Niro, Ltd.  
181 West Madison Street, Suite 4600  
Chicago, Illinois 60602-4515  
[jhosteny@hosteny.com](mailto:jhosteny@hosteny.com)

Via E-Mail

Adam L. Brookman, Esq.  
Boyle Fredrickson SC  
840 North Plankinton Avenue  
Milwaukee, Wisconsin 53203  
[abrookman@boylefred.com](mailto:abrookman@boylefred.com)  
[mtg@boylefred.com](mailto:mtg@boylefred.com)

Via CF/ECM

Benjamin M. Hanrahan  
Malloy & Malloy, P.A.  
2800 S.W. Third Avenue  
Miami, Florida 33129  
[bhanrahan@malloylaw.com](mailto:bhanrahan@malloylaw.com)

Via CF/ECM

Kevin J. McDevitt, Esq.  
Lisa A. Iverson, Esq.  
Neal & McDevitt, LLC  
1776 Ash Street  
Northfield, Illinois 60093  
[kmcdevitt@nealmcdevitt.com](mailto:kmcdevitt@nealmcdevitt.com)  
[lisa.iverson@nealmcdevitt.com](mailto:lisa.iverson@nealmcdevitt.com)

Via E-Mail

Many Mini Toys  
c/o Andrew P. Cooper, Esq.  
Hession Bekoff & Cooper, LLP  
1103 Stewart Avenue, Suite 200  
Garden City, New York 11530  
[acooper@hbclaw.net](mailto:acooper@hbclaw.net)

/s/ Kathleen A. Lyons

One of Plaintiff's Attorneys